

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. 685

**CERTIFICATION IN SUPPORT OF MOTION OF OOCL USA INC. FOR AN
ORDER FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C.
§ 362(d) OR TO COMPEL ABANDONMENT PURSUANT TO 11 U.S.C. § 554(b)**

Rick A. Steinberg, being of full age, hereby certifies as follows:

1. I am a member of the bar of the State of New Jersey and the United States District Court for the District of New Jersey and Of Counsel to the law firm, Price Meese Shulman & D'Arminio, P.C., attorneys for OOCL USA INC. ("OOCL") in the above-captioned matter.

2. I make this Certification in support of OOCL's Motion for an Order for Relief from the Automatic Stay, pursuant to 11 U.S.C. § 362(d) or to compel abandonment of cargo and to deem the cargo abandoned pursuant to 11 U.S.C. § 554(b) (the "Motion").

3. A copy of the Bills of Lading for the Cargo in OOCL's physical or constructive possession that may be property of the Debtors' estate is annexed hereto as Exhibit "A."

4. A copy of a Statement of Account listing the Bills of Lading and identifying the corresponding containers and other information regarding the Cargo in OOCL's physical or constructive possession that may be property of the Debtors' estate is annexed hereto as

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Exhibit “B.”

5. A copy of Lien Clause 16 from the OOCL terms and conditions on its bill of lading taken from the OOCL website is annexed hereto as Exhibit “C.”

6. A copy of the Letter dated March 26, 2025 from the Debtors’ Interim Chief Financial Officer to OOCL purporting to abandon the Cargo is annexed hereto as Exhibit “D.”

I hereby certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

/s/ Rick A. Steinberg
RICK A. STEINBERG

Dated: April 8, 2025